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March 27, 2024

Via ECF

The Honorable Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *Gonzalez v. Hanover Ventures Marketplace LLC et al*
Case No. 21-cv-01347 (ER)

Dear Judge Ramos:

We are counsel to Plaintiffs in the above-referenced case. We write, jointly with counsel for Defendants, to respectfully request a stay of all proceedings in this action, which will include a stay of any class notice dissemination, and the conference currently scheduled before Your Honor on April 24, 2024, as the parties have agreed to engage in a private class-wide mediation.

The parties request this stay continue pending the completion of the parties' contemplated class mediation, which the parties expect will be completed within 90 days from the date of this letter, due to the busy schedule of our agreed upon mediator, Martin Scheinman.

Additionally, the parties request that they report to the Court concerning the outcome of the mediation in a joint letter two weeks after the mediation is completed. If the parties are unable to reach a resolution through mediation, the parties propose that they, with their joint letter, submit a joint class notice dissemination plan and request for rescheduling of the April 24, 2024, conference.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ C.K. Lee

C.K. Lee, Esq.

The request to stay the case pending mediation is granted. The April 24, 2024, conference is adjourned. The parties shall submit a status update by no later than July 12, 2024. SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: March 28, 2024

New York, New York